

UNITED STATES DISTRICT COURT

MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

-VS-

KAFU CHUNG, a/k/a Steve Chung

FILED
WILKES BARRE

APR 03 2006

CRIMINAL COMPLAINT

CASE NUMBER: 2: MJ-06-50

DEPUTY CLERK

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief:

Count I: From in or about 1999 to the present, on numerous occasions, in the Middle District of Pennsylvania, and elsewhere, the defendant, KAFU CHUNG, a/k/a STEVE CHUNG, did directly and indirectly corruptly give, offer and promise things of value to public officials of the Department of Defense with the intent to influence official acts and to influence such Department of Defense employees to commit and aid in committing fraud on the United States and to induce such public officials to do and omit to do acts in violation of the lawful duty of such officials, in violation of Title 18, United States Code, Section 201(b)(1).

I further state that I am a(n) Special Agent of the U.S. Department of Defense, Defense Criminal Investigative Service, and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof. ☒ Yes ☐ No

Kristen McHale
Signature of Complainant

Sworn to before me, and subscribed in my presence

4/3/06 at
Date

Wilkes-Barre, Pennsylvania
City and State

Malachy E. Mannion, U.S. Magistrate Judge
Name and Title of Judicial Officer

[Signature]
Signature of Judicial Officer